

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

21 July 1995

Robert Krivinskas, Remedial Project Manager
US Department of the Navy
NAVFACENGCOM- Northern Division
Code 1823, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Draft Detailed Analysis of Alternatives Report
Navy Responses to RIDEM Comments for:
Site 06 - SOLVENT DISPOSAL AREA
Site 10 - CAMP FOGARTY DISPOSAL AREA
Site 11 - FIRE FIGHTING TRAINING AREA
Site 13 - DISPOSAL AREA NORTHWEST OF BUILDINGS W-3, W-4, & T-1

Dear Sir:

This Division has reviewed the Navy's responses to comments for the above cited IR sites and offers the following comments.

In regards to Site 06, Solvent Disposal Area, the Division understands that ground water at this site, among other IR sites at the base, has been designated as a separate base-wide ground water operable unit; therefore, comments concerning specific ground water contaminants (ie: manganese and lead) will be addressed in what is expected to be a separate RI/FS format. Based upon the Navy's responses, the Division further understands that base-wide surface water drainage will also be addressed in the ground water operable unit; therefore, sediments presently contained in catch basins, drainage ditches, and pipes throughout the base, and potentially migrating to the drainage systems will also be addressed within this separate RI/FS format.

Although the nature and extent of soil contamination at Site 06 does not in itself warrant removal, the Division is concerned with the potential for contamination to migrate into the water distribution system. The Division is aware that the integrity of the Navy's water distribution system has potentially been compromised and is in need of repair. Additionally, if problems with the distribution system, such as the leaking valve incident which occurred late last winter continue it will be necessary for the Navy or the future land owner to dig into areas which may be contaminated. Since these lines are interconnected with the Rhode Island Port Authority's

2

distribution system; if a water line break were ever to occur, the potential exists for cross contamination between systems. Repair and/or replacement of the system also poses greater risk to workers than risks associated with system replacement in a pristine area. This issue will require a documented response.


Concerning Site 10, Camp Fogarty Disposal Area, based on the Navy's responses, the Division expects that all issues will be resolved in the recently received EE/CA report and the ground water operable unit RI/FS.

Regarding Site 11, Fire Fighting Training Area, the Division accepts the Navy's responses and looks forward to the timely resolution of the ground water issues in the Ground water RI/FS and the soil issues in the revised DAA. Like Site 06, the Division expects the drainage systems to be addressed within the ground water operable unit.

The Division accepts the Navy's responses concerning Site 13, Disposal Area Northwest of Buildings W-3, W-4, & T-1 and expects all issues to be resolved upon completion of the removal action and with the submittal of the ground water RI/FS.

If I can be of any further assistance in expediting the studies and clean-up of the base please contact me. I look forward to a rapid resolution to the environmental problems present at the base. If you should have any questions, please call me at (401) 277-3872 extension 7142.

Sincerely,



Judith Graham
Engineer

cc: W. Angell, DEM DSR
R. Gottlieb, DEM DSR
C. Williams, USEPA Region 1